# Exhibit 22

**Silver Motion for Default Judgment** 

#### UNITED STATES DISTRICT COURT - SOUTHERN DISTRICT OF NEW YORK

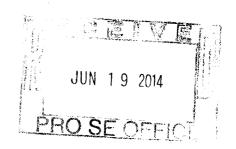
## MOTION FOR DEFAULT JUDGMENT BY FRANCINE SILVER

Case # 14CV3630(GD). PRESIDED OVER BY THE HONORABLE

JUDGE DANIELS.

DEFENSE COUNSEL
MORRISON & FOERSTER LLP
NORMAN ROSENBAUM
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MOVANT - FRANCINE SILVER 8613 Franklin Ave Los Angeles, CA 90069 Tel (310) 945 6105



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Movant hereby requests Judgment by Default due to Debtors failure to respond to Movant's brief by the June 16<sup>th</sup>, 2014 deadline.

Movant's claim is an allowed claim as per the settlement agreement and is also fair, well founded, and has never been contested. The Debtors have more than adequate funds currently held in trust to settle the allowed claims. Had the Debtors abided by the terms of the settlement agreement, the claim should have been paid on December 17<sup>th</sup>, 2013. The Debtors breach of the settlement agreement has perpetuated and greatly increased damages suffered by Movant.

A default judgment is appropriate for the numerous reasons already mentioned in the brief. Movant hereby requests that the Court grant a Default Judgment in the full amount of \$3,000,000.00 plus reasonable per diem interest and that the claim should be paid immediately and in no event later than June 30<sup>th</sup>, 2014.

Respectfully.

Francine Silver

### PROOF OF SERVICE FORM

PART 1: **Delivery by U.S. Mail**: Proof of Service by Mail.

I, Marcus Silver, declare that I am over the age of eighteen years and not a party to the action. My address is 8613 Franklin Ave, Los Angeles, CA 90069

On, June 18, 2014, I served the Motion for default judgment by placing a true copy in the United States mail enclosed in a sealed envelope with postage fully prepaid, addressed as follows:

Norman Rosenbaum
Morrison and Foerster
1290 Avenue of the Americas JUN 1 9 2014
New York, New York 10104
PRO SE OFFIN

PART 2: I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on June 18th<sup>th</sup>, 2014, in Los Angeles, California.

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